

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

IN RE INTEL CORPORATION
MICROPROCESSOR ANTITRUST
LITIGATION

MDL Docket No. 05-MD-1717-JJF
Civil Action No. 1:05-CV-00485-JJF

Judge Joseph J. Farnan, Jr.

**THE NATIONAL PLAINTIFFS GROUP'S
MOTION FOR CONSOLIDATION AND APPOINTMENT
OF INTERIM CLASS COUNSEL AND LIAISON COUNSEL**

Pursuant to the Court's January 10, 2006 Order and Rules 23(g) and 42(a) of the Federal Rules of Civil Procedure, the plaintiffs comprising the National Plaintiffs Group,¹ by their counsel, respectfully move the Court for an Order: (a) consolidating all purchaser antitrust actions pending against Intel Corporation ("Intel") for pretrial purposes pursuant to the Transfer Order entered on November 8 2005, by the Judicial Panel on Multidistrict Litigation, with respect to MDL Docket Number 1717; (b) appointing Wolf Haldenstein Adler Freeman & Herz

¹ The National Plaintiffs Group is comprised of the following named plaintiffs (identified by state), in each of following actions, filed in this Court: **(a)** Jim Kidwell (Arizona), Mary Reeder (Ohio), John Maita (New Jersey), JWRE, Inc. (Nebraska), Chrystal Moeller (Nebraska), and Caresse Harms (Nebraska), named plaintiffs in *Kidwell, et al. v. Intel Corp.*, No. 05-470, filed in the District of Delaware on July 6, 2005; **(b)** Robert J. Rainwater (Michigan), Kathy Ann Chapman (Minnesota), and Sonia Yaco (Wisconsin), named plaintiffs in *Rainwater, et al. v. Intel Corp.*, Case No. 05-473, filed in the District of Delaware on July 7, 2005; **(c)** James Volden (Iowa), Charles Dupraz (South Dakota), Vanessa Z. DeGeorge (North Carolina), Melissa Goeke (Maine), James R. Conley (North Dakota), Nancy Bjork (North Dakota), Tom Kidwell (Kansas), and Jeff Vaught (Kansas), named plaintiffs in *Volden, et al. v. Intel Corp.*, Case No. 05-488, filed in the District of Delaware on July 13, 2005; **(d)** Ficor Acquisition Co., LLC, dba Mills & Greer Sporting Goods (Vermont), Richard Caplan (Washington, D.C.), Maria Pilar Salgado (Florida), Paula Nardella (Massachusetts), Nancy Wolfe (Alabama), Leslie March (Louisiana), Tom Hobbs (Tennessee), Andrew Marcus (New York), and Virginia Deering (West Virginia), named plaintiffs in *Ficor Acquisition Corp., et al. v. Intel Corp.*, Case No. 05-515, filed in the District of Delaware on July 21, 2005; **(e)** Bill Richards (Mississippi), Ron Terranova (Nevada), and Carl Yamaguchi (Hawaii), in the action captioned *Richards, et al. v. Intel Corp.*, No. 05-672, filed in the District of Delaware on September 14, 2005; **(f)** David Kurzman, in the action captioned *Kurzman v. Intel Corp.*, No. 05-710, filed in the District of Delaware on September 29, 2005; and **(g)** Giacobbe-Fritz Fine Art LLC (New Mexico), in the action captioned *Giacobbe-Fritz Fine Art LLC v. Intel Corp.*, No. 05-846 (JJF), filed in the District of Delaware on December 7, 2005, and is supported by each of the 22 law firms listed on the signature block at the end of this pleading.

LLP (“Wolf Haldenstein”) as Interim Class Counsel in the consolidated action and any subsequently-filed related cases; and (c) appointing Biggs and Battaglia as Liaison Counsel. The grounds for this motion are set forth in the accompanying memorandum of law contemporaneously filed in support thereof.

DATED: January 24, 2006

BIGGS AND BATTAGLIA

/s/ Robert D. Goldberg
Robert D. Goldberg
921 North Orange Street
P.O. Box 1489
Wilmington, Delaware 19899
Telephone: (302) 655-9677
Facsimile: (302) 655-7924

***Proposed Liaison Counsel for the
National Plaintiffs Group***

WOLF HALDENSTEIN ADLER
FREEMAN & HERZ LLP
Fred Taylor Isquith
270 Madison Avenue
New York, New York 10016
Telephone: (212) 545-4600
Facsimile: (212) 545-4653

WOLF HALDENSTEIN ADLER
FREEMAN & HERZ LLC
Mary Jane Edelstein Fait
Adam J. Levitt
55 West Monroe Street, Suite 1111
Chicago, Illinois 60603
Telephone: (312) 984-0000
Facsimile: (312) 984-0001

WOLF HALDENSTEIN ADLER
FREEMAN & HERZ LLP
Francis M. Gregorek
Betsy C. Manifold
Francis A. Bottini, Jr.
Rachele R. Rickert
750 B Street, Suite 2770
San Diego, California 92101
Telephone: (619) 239-4599
Facsimile: (619) 234-4599

***Proposed Interim Class Counsel for
the National Plaintiffs Group***

Ann Lugbill
2406 Auburn Avenue
Cincinnati, Ohio 45219
Tel: (513) 784-1280
Fax: (513) 784-1449
Counsel for Mary Reeder

Brandon N. Voelker
28 West 5th Street
Covington, Kentucky 41011
Tel: (859) 491-5551
Fax: (859) 491-0187
Counsel for Mary Reeder

Gene Summerlin
OGBORN, SUMMERLIN
& OGBORN, PC
210 Windsor Place
330 South Tenth Street
Lincoln, Nebraska 68508
Tel: (402) 434-8040
Fax: (402) 434-8044
Counsel for JWRE, Inc., Chrystal Moeller, and Caresse Harms

Robert J. Sharkey
VANDERVOORT, CHRIST
& FISHER, PC
Fifth Third Bank Building, Suite 312
67 West Michigan Avenue
Battle Creek, Michigan 49017
Tel: (269) 965-7000
Fax: (269) 965-0646
Counsel for Robert J. Rainwater

Richard A. Lockridge
Robert K. Shelquist
LOCKRIDGE GRINDAL
NAUEN P.L.L.P.
100 Washington Avenue South, Suite 2200
Minneapolis, Minnesota 55401
Tel: (612) 339-6900
Fax: (612) 339-0981

***Counsel for Kathy Ann Chapman,
Nancy Bjork, Ron Terranova, and Carl Yamaguchi***

Noah Golden-Krasner
LAW OFFICES OF NOAH
GOLDEN-KRASNER
354 West Main Street
Madison, Wisconsin 53703
Tel: (608) 441-8924
Fax: (608) 442-9494

Counsel for Sonia Yaco

Tim Semelroth
RICCOLO & SEMELROTH, PC
425 Second St. SE, Ste 1140
Cedar Rapids, Iowa 52401
Tel: (319) 365-9200
Fax: (319) 365-1114

Counsel for Ryan James Volden

Robert J. Rubin, PA
RUBIN & STROUT, PA
480 West Street
Rockport, Maine 04856
Tel: (207) 236-8260
Fax: (207) 236-4981

Counsel for Melissa Goeke

Charles F. Speer
Donnamarie Landsberg
SPEER LAW FIRM, PC
104 W. 9th Street, Suite 305
Kansas City, Missouri 64105
Tel: (816) 472-3560
Fax: (816) 421-2150

Counsel for Jeff Vaught

Dennis J. Johnson
JOHNSON & PERKINSON
1690 Williston Road
South Burlington, Vermont 05403
Tel: (802) 862-0030
Fax: (802) 862-0060

***Counsel for Ficor Acquisition Co., LLC,
dba Mills & Greer Sporting Goods***

Peter G. Gruber
PETER G. GRUBER, P.A.
One Datran Center, Suite 910
9100 South Dadeland Boulevard
Miami, Florida 33156
Tel: (305) 670-1010
Fax: (305) 670-0228
Counsel for Maria Pilar Salgado

Nancy Freeman Gans
MOULTON & GANS, P.C.
33 Broad Street, Suite 1100
Boston, Massachusetts 02109
Tel: (617) 369-7979
Fax: (617) 369-7980
Counsel for Paula Nardella

Richard J.R. Raleigh Jr.
WILMER & LEE, P.A.
100 Washington Street, Suite 200
Huntsville, Alabama 35801
Tel: (256) 533-0202
Fax: (256) 533-0302
Counsel for Nancy Wolfe

Jayne Goldstein
MAGER & GOLDSTEIN LLP
2825 University Drive, Suite 350
Coral Springs, Florida 33065
Tel: (954) 341-0844
Fax: (954) 341-0855
***Counsel for Leslie March, Virginia Deering,
and Giacobbe-Fritz Fine Art LLC***

Carol A. Mager
MAGER & GOLDSTEIN LLP
One Liberty Place, 21st Floor
Philadelphia, Pennsylvania 19103
Tel: (215) 640-3280
Fax: (215) 640-3281
***Counsel for Leslie March, Virginia Deering,
and Giacobbe-Fritz Fine Art LLC***

Van Bunch
BONNETT, FAIRBOURN, FRIEDMAN
& BALINT, PC

57 Carriage Hill
Signal Mountain, Tennessee 37377
Tel: (423) 886-9736

Counsel for Tom Hobbs

Barry C. Blackburn
THE BLACKBURN LAW FIRM, PLLC
6933 Crumpler Boulevard, Suite B
P.O. Box 70
Olive Branch, Mississippi
Tel: (662) 895-6116
Fax: (662) 895-6121

Counsel for Bill Richards

Greg McEwen
THE MCEWEN LAW FIRM, P.L.L.C.
5850 Blackshire Path
Inver Grove Heights, Minnesota 55076
Tel: (651) 224-3833
Fax: (651) 223-5790

Counsel for Ron Terranova

Jerold T. Matayoshi
FUKUNAGA MATAYOSHI HERSHEY
& CHING, LLP
Davies Pacific Center, Suite 1200
841 Bishop Street
Honolulu, Hawaii 96813
Tel: (808) 533-4300
Fax: (808) 531-7585

Counsel for Carl Yamaguchi

Patrick J. Murphy
MURPHY, SMALL & ASSOCIATES
1100 East Bridger Avenue
Las Vegas, Nevada 89101
Tel: (702) 259-4600
Fax: (702) 259-4748

Counsel for Ron Terranova

David Pastor
GILMAN AND PASTOR, L.L.P
60 State Street, 37th Floor
Boston, Massachusetts 02109
Tel: (617) 742-9700
Fax: (617) 742-9701

Counsel for David Kurzman

427144

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

IN RE INTEL CORPORATION
MICROPROCESSOR ANTITRUST
LITIGATION

MDL Docket No. 05-MD-1717-JJF
Civil Action No. 1:05-CV-00485-JJF

Judge Joseph J. Farnan, Jr.

**[PROPOSED] ORDER FOR CONSOLIDATION OF
PURCHASER ANTITRUST ACTIONS AND APPOINTMENT
OF INTERIM CLASS COUNSEL AND LIAISON COUNSEL**

Upon the motion of the plaintiffs comprising the National Plaintiffs Group (as defined below),¹ for an Order pursuant to Rules 23(g) and 42(a) of the Federal Rules of Civil Procedure consolidating the purchaser antitrust actions presently coordinated before this Court pursuant to the Order entered on November 8 2005, by the Judicial Panel on Multidistrict Litigation, with respect to MDL Docket Number 1717, and appointing Wolf Haldenstein Adler Freeman & Herz

¹ The National Plaintiffs Group is comprised of the following named plaintiffs (identified by state), in each of following actions, filed in this Court: (a) Jim Kidwell (Arizona), Mary Reeder (Ohio), John Maita (New Jersey), JWRE, Inc. (Nebraska), Chrystal Moeller (Nebraska), and Caresse Harms (Nebraska), named plaintiffs in *Kidwell, et al. v. Intel Corp.*, No. 05-470, filed in the District of Delaware on July 6, 2005; (b) Robert J. Rainwater (Michigan), Kathy Ann Chapman (Minnesota), and Sonia Yaco (Wisconsin), named plaintiffs in *Rainwater, et al. v. Intel Corp.*, Case No. 05-473, filed in the District of Delaware on July 7, 2005; (c) James Volden (Iowa), Charles Dupraz (South Dakota), Vanessa Z. DeGeorge (North Carolina), Melissa Goeke (Maine), James R. Conley (North Dakota), Nancy Bjork (North Dakota), Tom Kidwell (Kansas), and Jeff Vaught (Kansas), named plaintiffs in *Volden, et al. v. Intel Corp.*, Case No. 05-488, filed in the District of Delaware on July 13, 2005; (d) Ficor Acquisition Co., LLC, dba Mills & Greer Sporting Goods (Vermont), Richard Caplan (Washington, D.C.), Maria Pilar Salgado (Florida), Paula Nardella (Massachusetts), Nancy Wolfe (Alabama), Leslie March (Louisiana), Tom Hobbs (Tennessee), Andrew Marcus (New York), and Virginia Deering (West Virginia), named plaintiffs in *Ficor Acquisition Corp., et al. v. Intel Corp.*, Case No. 05-515, filed in the District of Delaware on July 21, 2005; (e) Bill Richards (Mississippi), Ron Terranova (Nevada), and Carl Yamaguchi (Hawaii), in the action captioned *Richards, et al. v. Intel Corp.*, No. 05-672, filed in the District of Delaware on September 14, 2005; (f) David Kurzman, in the action captioned *Kurzman v. Intel Corp.*, No. 05-710, filed in the District of Delaware on September 29, 2005; and (g) Giacobbe-Fritz Fine Art LLC (New Mexico), in the action captioned *Giacobbe-Fritz Fine Art LLC v. Intel Corp.*, No. 05-846 (JJF), filed in the District of Delaware on December 7, 2005, and is supported by each of the 22 law firms listed on the signature block at the end of this pleading.

LLP (“Wolf Haldenstein”) as Interim Class Counsel; and Biggs and Battaglia as Liaison Counsel, it is hereby Ordered as follows:

1. Consistent with the Order entered on November 8, 2005, by the Judicial Panel on Multidistrict Litigation, with respect to MDL Docket Number 1717, the Court hereby consolidates all purchaser antitrust actions pending against Intel Corporation (“Intel”) for pretrial purposes.

2. That Wolf Haldenstein Adler Freeman & Herz LLP is hereby appointed Interim Class Counsel for the proposed Classes in each of the purchaser antitrust actions, pursuant to Rule 23(g)(2)(A) of the Federal Rules of Civil Procedure. Interim Class Counsel shall be responsible for prosecuting and resolving all claims asserted, or which may be asserted, in the purchaser antitrust actions as set forth hereafter;

3. If it deems appropriate, and at its sole discretion, Interim Class Counsel shall make work assignments to other plaintiffs’ counsel in the purchaser antitrust actions with a view to utilize efficiently the resources of other plaintiffs’ counsel in light of the experience of the individual attorneys assigned to the case by the various firms, taking into consideration the particular needs of the project, billing rates, and appropriate experience, and the size and complexity of the project in the litigation, and to avoid unnecessary duplication of effort with respect to the prosecution of the purchaser antitrust actions;

4. That no papers shall be served, and no proceedings, process or other procedures shall be commenced or initiated on the behalf of the named plaintiffs or other members of the proposed Classes in the purchaser antitrust cases except by or through Interim Class Counsel, or, by any counsel, upon good cause shown, with leave of Court;

5. That Interim Class Counsel shall specifically assume the following duties and responsibilities on behalf of plaintiffs and the other members of the proposed Classes with respect to the purchaser antitrust actions:

(a) direct, and execute on behalf of plaintiffs, all pleadings and other filings with the Court;

(b) direct the briefing and argument of all motions;

(c) direct the conduct of discovery proceedings including, among other things, the scheduling and examination of witnesses in depositions;

(d) direct the selection of counsel to act as spokespersons with the Court;

(e) accept service of papers for all plaintiffs with respect to any document served by defendants, other than papers filed through the ECF system, and distribute the same to plaintiffs' counsel, as appropriate;

(f) call and chair meetings of plaintiffs' counsel as they deem necessary and appropriate from time to time and to distribute to all plaintiffs' counsel copies of motions, orders, and decisions of the Court, where appropriate, and to maintain up-to-date service lists, to be made available to the Court;

(g) direct and conduct all settlement negotiations;

(h) direct and conduct all pretrial proceedings, trial preparation, trials and post-trial proceedings, and delegate work responsibilities to selected counsel as may be required;

(i) collect time records from plaintiffs' counsel; and

(j) supervise any other matters concerning the prosecution or resolution of the above-captioned litigation and otherwise manage the prosecution of any claims asserted in the purchaser antitrust actions.

6. That Biggs and Battaglia be appointed Liaison Counsel for the proposed Classes in all the purchaser antitrust actions. Liaison Counsel shall be the firm to which the Court may direct inquiries and shall be responsible for maintaining and distributing an up-to-date service list, distributing to all plaintiffs' counsel Court Orders, pleadings, and other documents in the

purchaser antitrust cases, and performing other assignments as requested by Interim Class Counsel or the Court.

Dated: _____, 2006

JOSEPH J. FARNAN, JR.
UNITED STATES DISTRICT JUDGE

427231

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

IN RE INTEL CORPORATION
MICROPROCESSOR ANTITRUST
LITIGATION

MDL Docket No. 05-MD-1717-JJF
Civil Action No. 1:05-CV-00485-JJF

Judge Joseph J. Farnan, Jr.

STATEMENT PURSUANT TO LOCAL RULE 7.1.1

The undersigned counsel for the plaintiffs comprising the National Plaintiffs Group¹ – movants for appointment as Interim Class Counsel in these coordinated cases pursuant to Rule 23(g) of the Federal Rules of Civil Procedure – certify, pursuant to Rule 7.1.1. of the Local Rules of Civil Practice and Procedure of the United States District Court for the District of Delaware, that they have made reasonable efforts, on several occasions, to reach agreement with the

¹ The National Plaintiffs Group is comprised of the following named plaintiffs (identified by state), in each of following actions, filed in this Court: **(a)** Jim Kidwell (Arizona), Mary Reeder (Ohio), John Maita (New Jersey), JWRE, Inc. (Nebraska), Chrystal Moeller (Nebraska), and Caresse Harms (Nebraska), named plaintiffs in *Kidwell, et al. v. Intel Corp.*, No. 05-470, filed in the District of Delaware on July 6, 2005; **(b)** Robert J. Rainwater (Michigan), Kathy Ann Chapman (Minnesota), and Sonia Yaco (Wisconsin), named plaintiffs in *Rainwater, et al. v. Intel Corp.*, Case No. 05-473, filed in the District of Delaware on July 7, 2005; **(c)** James Volden (Iowa), Charles Dupraz (South Dakota), Vanessa Z. DeGeorge (North Carolina), Melissa Goeke (Maine), James R. Conley (North Dakota), Nancy Bjork (North Dakota), Tom Kidwell (Kansas), and Jeff Vaught (Kansas), named plaintiffs in *Volden, et al. v. Intel Corp.*, Case No. 05-488, filed in the District of Delaware on July 13, 2005; **(d)** Ficor Acquisition Co., LLC, dba Mills & Greer Sporting Goods (Vermont), Richard Caplan (Washington, D.C.), Maria Pilar Salgado (Florida), Paula Nardella (Massachusetts), Nancy Wolfe (Alabama), Leslie March (Louisiana), Tom Hobbs (Tennessee), Andrew Marcus (New York), and Virginia Deering (West Virginia), named plaintiffs in *Ficor Acquisition Corp., et al. v. Intel Corp.*, Case No. 05-515, filed in the District of Delaware on July 21, 2005; **(e)** Bill Richards (Mississippi), Ron Terranova (Nevada), and Carl Yamaguchi (Hawaii), in the action captioned *Richards, et al. v. Intel Corp.*, No. 05-672, filed in the District of Delaware on September 14, 2005; **(f)** David Kurzman, in the action captioned *Kurzman v. Intel Corp.*, No. 05-710, filed in the District of Delaware on September 29, 2005; and **(g)** Giacobbe-Fritz Fine Art LLC (New Mexico), in the action captioned *Giacobbe-Fritz Fine Art LLC v. Intel Corp.*, No. 05-846 (JJF), filed in the District of Delaware on December 7, 2005, and is supported by each of the 22 law firms listed on the signature block at the end of this pleading.

attorneys comprising the leadership of the San Francisco Group² with respect to the appointment of Interim Class Counsel in these coordinated actions, but were unable to do so.³ The National Plaintiffs Group did not confer with either Defendants' counsel or AMD's counsel with respect to the Rule 23(g) motion practice, since neither of those groups are opposing or otherwise taking positions with respect thereto.

DATED: January 24, 2006

BIGGS AND BATTAGLIA

/s/ Robert D. Goldberg
Robert D. Goldberg
921 North Orange Street
P.O. Box 1489
Wilmington, Delaware 19899
Telephone: (302) 655-9677
Facsimile: (302) 655-7924

***Proposed Liaison Counsel for the
National Plaintiffs Group***

WOLF HALDENSTEIN ADLER
FREEMAN & HERZ LLP
Fred Taylor Isquith
270 Madison Avenue
New York, New York 10016
Telephone: (212) 545-4600
Facsimile: (212) 545-4653

WOLF HALDENSTEIN ADLER
FREEMAN & HERZ LLC
Mary Jane Edelstein Fait
Adam J. Levitt

² The "San Francisco Group" refers to the plaintiffs and law firms that filed a Rule 23(g) motion on November 10, 2005. The proposed four co-lead counsel in that group are the San Francisco firms of Saveri & Saveri, Inc. and The Furth Firm, the Seattle office of Hagens Berman Sobol Shapiro LLP, and the Washington, D.C. firm of Cohen Milstein Hausfeld & Toll, P.L.L.C..

³ In addition to telephonically contacting Prickett, Jones & Elliot, P.A. – local counsel for the San Francisco Group – on January 18, 2006 to confer in an effort to resolve our differences prior to filing our Rule 23(g) motion, counsel for the National Plaintiffs Group has, on multiple occasions prior to today, made efforts to work cooperatively and jointly with the San Francisco Group, in the best interests of the proposed classes. The San Francisco Group refused and rebuffed all of the National Plaintiffs Group's efforts.

55 West Monroe Street, Suite 1111
Chicago, Illinois 60603
Telephone: (312) 984-0000
Facsimile: (312) 984-0001

WOLF HALDENSTEIN ADLER
FREEMAN & HERZ LLP
Francis M. Gregorek
Betsy C. Manifold
Francis A. Bottini, Jr.
Rachele R. Rickert
750 B Street, Suite 2770
San Diego, California 92101
Telephone: (619) 239-4599
Facsimile: (619) 234-4599

***Proposed Interim Class Counsel for
the National Plaintiffs Group***

Ann Lugbill
2406 Auburn Avenue
Cincinnati, Ohio 45219
Tel: (513) 784-1280
Fax: (513) 784-1449
Counsel for Mary Reeder

Brandon N. Voelker
28 West 5th Street
Covington, Kentucky 41011
Tel: (859) 491-5551
Fax: (859) 491-0187
Counsel for Mary Reeder

Gene Summerlin
OGBORN, SUMMERLIN
& OGBORN, PC
210 Windsor Place
330 South Tenth Street
Lincoln, Nebraska 68508
Tel: (402) 434-8040
Fax: (402) 434-8044
Counsel for JWRE, Inc., Chrystal Moeller, and Caresse Harms

Robert J. Sharkey
VANDERVOORT, CHRIST
& FISHER, PC
Fifth Third Bank Building, Suite 312
67 West Michigan Avenue
Battle Creek, Michigan 49017
Tel: (269) 965-7000
Fax: (269) 965-0646
Counsel for Robert J. Rainwater

Richard A. Lockridge
Robert K. Shelquist
LOCKRIDGE GRINDAL
NAUEN P.L.L.P.
100 Washington Avenue South, Suite 2200
Minneapolis, Minnesota 55401
Tel: (612) 339-6900
Fax: (612) 339-0981
***Counsel for Kathy Ann Chapman,
Nancy Bjork, Ron Terranova, and Carl Yamaguchi***

Noah Golden-Krasner
LAW OFFICES OF NOAH
GOLDEN-KRASNER
354 West Main Street
Madison, Wisconsin 53703
Tel: (608) 441-8924
Fax: (608) 442-9494
Counsel for Sonia Yaco

Tim Semelroth
RICCOLO & SEMELROTH, PC
425 Second St. SE, Ste 1140
Cedar Rapids, Iowa 52401
Tel: (319) 365-9200
Fax: (319) 365-1114
Counsel for Ryan James Volden

Robert J. Rubin, PA
RUBIN & STROUT, PA
480 West Street
Rockport, Maine 04856
Tel: (207) 236-8260
Fax: (207) 236-4981
Counsel for Melissa Goeke

Charles F. Speer
Donnamarie Landsberg
SPEER LAW FIRM, PC
104 W. 9th Street, Suite 305
Kansas City, Missouri 64105
Tel: (816) 472-3560
Fax: (816) 421-2150
Counsel for Jeff Vaught

Dennis J. Johnson
JOHNSON & PERKINSON
1690 Williston Road
South Burlington, Vermont 05403
Tel: (802) 862-0030
Fax: (802) 862-0060
***Counsel for Ficor Acquisition Co., LLC,
dba Mills & Greer Sporting Goods***

Peter G. Gruber
PETER G. GRUBER, P.A.
One Datran Center, Suite 910
9100 South Dadeland Boulevard
Miami, Florida 33156
Tel: (305) 670-1010
Fax: (305) 670-0228
Counsel for Maria Pilar Salgado

Nancy Freeman Gans
MOULTON & GANS, P.C.
33 Broad Street, Suite 1100
Boston, Massachusetts 02109
Tel: (617) 369-7979
Fax: (617) 369-7980
Counsel for Paula Nardella

Richard J.R. Raleigh Jr.
WILMER & LEE, P.A.
100 Washington Street, Suite 200
Huntsville, Alabama 35801
Tel: (256) 533-0202
Fax: (256) 533-0302
Counsel for Nancy Wolfe

Jayne Goldstein
MAGER & GOLDSTEIN LLP
2825 University Drive, Suite 350
Coral Springs, Florida 33065
Tel: (954) 341-0844
Fax: (954) 341-0855
***Counsel for Leslie March, Virginia Deering,
and Giacobbe-Fritz Fine Art LLC***

Carol A. Mager
MAGER & GOLDSTEIN LLP
One Liberty Place, 21st Floor
Philadelphia, Pennsylvania 19103
Tel: (215) 640-3280
Fax: (215) 640-3281
***Counsel for Leslie March, Virginia Deering,
and Giacobbe-Fritz Fine Art LLC***

Van Bunch
BONNETT, FAIRBOURN, FRIEDMAN
& BALINT, PC
57 Carriage Hill
Signal Mountain, Tennessee 37377
Tel: (423) 886-9736
Counsel for Tom Hobbs

Barry C. Blackburn
THE BLACKBURN LAW FIRM, PLLC
6933 Crumpler Boulevard, Suite B
P.O. Box 70
Olive Branch, Mississippi
Tel: (662) 895-6116
Fax: (662) 895-6121
Counsel for Bill Richards

Greg McEwen
THE MCEWEN LAW FIRM, P.L.L.C.
5850 Blackshire Path
Inver Grove Heights, Minnesota 55076
Tel: (651) 224-3833
Fax: (651) 223-5790
Counsel for Ron Terranova

Jerold T. Matayoshi
FUKUNAGA MATAYOSHI HERSHEY
& CHING, LLP
Davies Pacific Center, Suite 1200
841 Bishop Street
Honolulu, Hawaii 96813
Tel: (808) 533-4300
Fax: (808) 531-7585
Counsel for Carl Yamaguchi

Patrick J. Murphy
MURPHY, SMALL & ASSOCIATES
1100 East Bridger Avenue
Las Vegas, Nevada 89101
Tel: (702) 259-4600
Fax: (702) 259-4748
Counsel for Ron Terranova

David Pastor
GILMAN AND PASTOR, L.L.P
60 State Street, 37th Floor
Boston, Massachusetts 02109
Tel: (617) 742-9700
Fax: (617) 742-9701

Counsel for David Kurzman

8934

CERTIFICATE OF SERVICE

I, Robert D. Goldberg, undersigned counsel of record, hereby certify that on January 24, 2006, I caused a copy of the attached **THE NATIONAL PLAINTIFFS GROUP'S MOTION FOR CONSOLIDATION AND APPOINTMENT OF INTERIM CLASS COUNSEL AND LIAISON COUNSEL** to be served on the following in the manner indicated:

VIA ELECTRONIC FILING

David Mark Balabanian

Bingham McCutchen LLP
Three Embarcadero Center
San Francisco, CA 94111-4067
Email: david.balabanian@bingham.com

Jef Feibelman

Burch Porter & Johnson
130 N. Court Ave.
Memphis, TN 38103
901-524-5000
Email: jfeibelman@bpjlaw.com

Jerry W. Laughlin

Rogers Laughlin Nunnally Hood & Crum
100 South Main St.
Greeneville, TN 37743
423-639-5183
Email: jlaughlin2@earthlink.net

Joy K. Fuyuno

Bingham McCutchen LLP
Three Embarcadero Center
San Francisco, CA 94111
415-393-2000
Email: joy.fuyuno@bingham.com

Richard L. Horwitz

Potter Anderson & Corroon, LLP
1313 N. Market St., Hercules Plaza, 6th Flr.
P.O. Box 951
Wilmington, DE 19899-0951
(302) 984-6000

Email: rhowitz@potteranderson.com

Christopher B. Hockett

Bingham McCutchen LLP
Three Embarcadero Center
San Francisco, CA 94111
415-393-2000

Email: chris.hockett@bingham.com

Daniel S. Floyd

Pro Hac Vice

Email: dfloyd@gibsondunn.com

Darren B. Bernhard

Pro Hac Vice

Email: bernhardd@howrey.com

Robert E. Cooper

Pro Hac Vice

Email: rcoper@gibsondunn.com

David William Gregory

Prickett, Jones & Elliott, P.A.
1310 King St., P.O. Box 1328
Wilmington, DE 19899
(302) 888-6500

Email: dwgregory@prickett.com

Eric M. Andersen

Prickett, Jones & Elliott, P.A.
1310 King St., P.O. Box 1328
Wilmington, DE 19899
(302) 888-6500

Email: emandersen@prickett.com

James L. Holzman

Prickett, Jones & Elliott, P.A.
1310 King St., P.O. Box 1328
Wilmington, DE 19899
(302) 888-6500

Email: jholzman@prickett.com

A. Zachary Naylor

Chimicles & Tikellis, LLP
One Rodney Square
P.O. Box 1035
Wilmington, DE 19899
(302) 656-2500

Email: zacharynaylor@chimicles.com

Fred T. Isquith

Wolf Haldenstein Adler Freeman & Herz
270 Madison Ave., 11th Floor
New York, NY 10016
(212) 545-4600
Email: Isquith@whafh.com

Adam L. Balick

Balick & Balick
711 North King Street
Wilmington, DE 19801-3503
(302) 658-4265
Email: abalick@balick.com

Chad Michael Shandler

Richards, Layton & Finger
One Rodney Square
P.O. Box 551
Wilmington, DE 19899
(302) 658-6541
Email: shandler@rlf.com

Charles P. Diamond

O'Melveny & Myers LLP
1999 Avenue of the Stars, 7th Floor
Los Angeles, CA 90067
Email: CDiamond@omm.com

Frederick L. Cottrell, III

Richards, Layton & Finger
One Rodney Square
P.O. Box 551
Wilmington, DE 19899
(302) 658-6541
Email: cottrell@rlf.com

Steven J. Fineman

Richards, Layton & Finger
One Rodney Square, P.O. Box 551
Wilmington, DE 19899
(302) 658-6541
Email: fineman@rlf.com

Linda J. Smith

O'Melveny & Myers LLP
1999 Avenue of the Stars, 7th Floor
Los Angeles, CA 90067
Email: lsmith@omm.com

Mark A. Samuels

O'Melveny & Meyers LLP
1999 Avenue of the Stars
7th Floor
Los Angeles, CA 90067
Email: MSamuels@omm.com

James Gordon McMillan, III

Bouchard Margules & Friedlander
222 Delaware Avenue, Suite 1400
Wilmington, DE 19801
(302) 573-3500
Email: jmcmillan@bmf-law.com

Steve W. Berman

Hagens Berman Sobol Shapiro LLP
1301 Fifth Avenue
Suite 2900
Seattle, WA 98101
Email: steve@hbsslw.com

Garrett D. Blanchfield, Jr.

Richard Wendorf & Blanchfield
E-1250 First National Bank Building
332 Minnesota St.
St. Paul, MN 55101
Email: g.blanchfield@rwblawfirm.com

Jeffrey F. Keller

Law Offices of Jeffrey F. Keller
425 Second St., Suite 500
San Francisco, CA 94107
415-543-1305
Email: jfkeller@kellergrover.com

Michele C. Jackson

Lieff Cabraser Heimann & Bernstein LLP
Embarcadero Center West
275 Battery St., 30th Floor
San Francisco, CA 94111
Email: mjackson@lchb.com

Michael P. Lehmann

Furth Firm LLP
225 Bush St.
15th Floor
San Francisco, CA 94104
(415) 433-2070

Email: mlehmann@furth.com

R. Alexander Saveri

Saveri & Saveri Inc.
111 Pine St., Suite 1700
San Francisco, CA 94111
Email: rick@saveri.com

Bruce J. Wecker

Hosie & McArthur
1 Market St.
Spear Street Tower
Suite 2200
San Francisco, CA 94105
Email: bwecker@hosielaw.com

Francis O. Scarpulla

Law Offices of Francis O. Scarpulla
44 Montgomery St.
Suite 3400
San Francisco, CA 94104
415-788-7210
Email: fosl@pacbell.net

Ali Oromchian

Finkelstein Thompson & Loughran
601 Montgomery Street, Suite 665
San Francisco, CA 94111
415-398-8700
Email: ao@ftllaw.com

Juden Justice Reed

Schubert & Reed LLP
Three Embarcadero Center, Suite 1650
San Francisco, CA 94111
415-788-4220
Email: jreed@schubert-reed.com

Joseph M. Patane

Law Office of Joseph M. Patane
2280 Union St.
San Francisco, CA 94123
415-563-7200
Email: jpatane@tatp.com

Maria Nunzio Alioto

Trump Alioto Trump & Prescott LLP
2280 Union St.
San Francisco, CA 94123
415-563-7200

Email: malimoto@tatp.com

Nancy Fineman

Cotchett Pitre Simon & McCarthy
840 Malcolm Rd., Suite 200
Burlingame, CA 94010
650-697-6000
Email: nfineman@cpsmlaw.com

Donald Chidi Amamgbo

Amambgo & Associates APC
1940 Embarcadero Cove
Oakland, CA 94606
510-434-7800
Email: DonaldAmambgo@Citycom.com

Reginald Von Terrell

The Terrell Law Group
223 25th Street
Richmond, CA 94804
510-237-9700
Email: REGGIE2@aol.com

David Boies, III

Straus & Boies LLP
4041 University Dr., 5th Floor
Fairfax, VA 22030
703-764-8700
Email: dboies@straus-boies.com

Donald F. Drummond

Drummond & Associates
One California St., Suite 300
San Francisco, CA 94111
415-433-2261
Email: ballen@drummondlaw.net

Gordon Ball

Ball & Scott
550 Main Avenue, 750 NationsBank Center
Knoxville, TN 37902
865-525-7028
Email: filings@ballandscott.com

B.J. Wade

Glassman Edwards Wade & Wyatt P.C.
26 N. Second St.
Memphis, TN 38103
901-527-4673

Email: bwade@gewwlaw.com

VIA FIRST CLASS MAIL

Harvey W. Gurland

Duane Morris
200 S. Biscayne Blvd., Suite 3400
Miami, FL 33131

Richard A. Ripley

Bingham McCutchen
1120 20th Street, NW Suite 800
Washington, DC 20036
202-778-6150

Michael J. Beck

Clerk, MDL Judicial Panel
One Columbus Circle, N.E.
Room G-255, Federal Judiciary Bldg
Washington, DC 20002-8004

Daniel Hume

Kirby McInerney & Squire L.L.P.
830 Third Avenue, 10th Floor
New York, NY 10022

Randy R. Renick

128 North Fair Oaks Avenue
Suite 204
Pasadena, CA 91103
626-585-9608

Scott Ames

Serratore & Ames
9595 Wilshire Blvd.
Suite 201
Los Angeles, CA 90212
310-205-2460

Daniel B. Allanoff

Meredith Cohen Greenfogel & Skirnick P.C.
117 South 17th St.
22nd Floor
Architects Building
Philadelphia, PA 19103
215-564-5182

Craig C. Corbitt

Zelle Hofmann Voelbel Mason & Gette LLP
44 Montgomery Street
Suite 3400
San Francisco, CA 94104
415-693-0700

Douglas G. Thompson, Jr.

Finkelstein Thompson & Loughran
1050 30th St., N.W.
Washington, DC 20007

Donald L. Perelman

Fine Kaplan & Black RPC
1835 Market St.
28th Floor
Philadelphia, PA 19103
215-567-6565

Russell M. Aoki

Aoki Sakamoto Grant LLP
One Convention Place
701 Pike St., Suite 1525
Seattle, WA 98101
206-624-1400

Edward A. Wallace

The Wexler Firm LLP
One North LaSalle St.
Suite 2000
Chicago, IL 60602
312-346-2222

Lance A. Harke

Harke & Clasby LLP
155 South Miami Ave., Suite 600
Miami, FL 33130

Michael L. Kirby

Kirby Noonan Lance and Hoge
600 West Broadway
Suite 1100
San Diego, CA 92101-3302
619-231-9593

/s/ Robert D. Goldberg
Robert D. Goldberg (I.D. #631)